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U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

February 10, 2022

VIA ECF

Hon. Jesse M. Furman United States District Judge United States District Court 40 Centre Street, Room 2202 New York, NY 10007

Re: Manuel Ignacio Guzman Merejo v. Mayorkas, et al., 21-cv-10418 (JMF)

Dear Judge Furman:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to reopen and approve his Application to Register Permanent Residence or Adjust Status (Form I-485). On behalf of the government, I write respectfully to request an on-consent extension of time of sixty days to respond to the complaint (*i.e.*, from February 14 to April 15, 2022). I also respectfully request that the initial conference presently scheduled for March 8, 2022, be adjourned until the week of May 2 or thereafter.

The extension is respectfully requested because the necessary file is still in transit to the USCIS office responsible for the adjudication and thus additional time is needed to evaluate the plaintiff's case as well as determine next steps which potentially would render this action moot. This is the government's first request for an extension of the deadline to respond to the complaint and to adjourn the initial conference. Plaintiff consents to these requests.

I thank the Court for its consideration of this letter.

Application GRANTED. The pretrial conference scheduled for March 8, 2022, is hereby

ADJOURNED to May 2, 2022 at 4:45 p.m. The Clerk of Court is directed to terminate ECF No. 7.

SO ORDERED.

February 11, 2022

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: <u>s/Jacqueline Roman</u>

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Attorney for Defendants

cc: Counsel of record (via ECF)